

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BEVERLY ADKINS, CHARMAINE WILLIAMS,
REBECCA PETTWAY, RUBBIE McCOY,
WILLIAM YOUNG, on behalf of themselves and all
others similarly situated, and MICHIGAN LEGAL
SERVICES,

Plaintiffs,

v.

MORGAN STANLEY, MORGAN STANLEY &
CO. LLC, MORGAN STANLEY ABS CAPITAL I
INC., MORGAN STANLEY MORTGAGE
CAPITAL INC., and MORGAN STANLEY
MORTGAGE CAPITAL HOLDINGS LLC,

Defendants.

1:12-cv-7667-VEC-GWG

**DECLARATION OF SKYE PERRYMAN IN SUPPORT OF
DEFENDANTS' MOTION TO EXCLUDE ALL OPINIONS
CONTAINED IN THE REPORT OF PATRICIA A. MCCOY AND
ONE OPINION CONTAINED IN THE REPORT OF IAN AYRES**

I, SKYE PERRYMAN, pursuant to 28 U.S.C. § 1746, hereby declare the following under penalty of perjury:

1. I am a counsel at the law firm of Wilmer, Cutler, Pickering, Hale and Dorr LLP, counsel of record for Defendants in this litigation. I am a member in good standing of the bars of the District of Columbia and Texas and I am admitted to practice Pro Hac Vice in this Court. I submit this declaration in support of Defendants' Motion to Exclude All Opinions Contained in the Report of Patricia A. McCoy and One Opinion Contained in the Report of Ian Ayres. I have personal knowledge of the statements contained in this declaration, the facts set forth are true to the best of my knowledge, and, if called as a witness, could and would testify competently to the

statements contained in this declaration.

2. Attached as Exhibit A is a true and correct copy of excerpts of the October 29, 2014 deposition of Timothy Riddiough.

3. Attached as Exhibit B is a true and correct copy of excerpts of the April 2, 2014 deposition of Patricia Lindsay.

4. Attached as Exhibit C is a true and correct copy of excerpts of the June 19, 2014 deposition of Warren Licata.

5. Attached as Exhibit D is a true and correct copy of excerpts of the June 30, 2014 deposition of William McKay.

6. Attached as Exhibit E is a true and correct copy of excerpts of the November 13, 2014 deposition of Marsha Courchane.

7. Attached as Exhibit F is a true and correct copy of excerpts of the Final Report of Michael J. Missal, Bankruptcy Court Examiner, *In re: New Century TRS Holdings, Inc.*, No. 07-10416 (D. Del. Bankr. Ct. 2008), ECF No. 5518, *available at* http://graphics8.nytimes.com/packages/pdf/business/Final_Report_New_Century.pdf.

8. Attached as Exhibit G is a true and correct copy of excerpts of the August 22, 2014 deposition of Ian Ayres.

9. Defendants have previously submitted a true and correct copy of the August 29, 2014 deposition of Patricia McCoy as Exhibit A to the Bressler Declaration, dated November 5, 2014 (ECF No. 190).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 10, 2014.



Skye Perryman